
From: James W. Bartlett, Jr.
Sent: Thursday, May 11, 2023 1:04 PM
To: Adam Langley; Guffy, Philip; Silverstein, Paul; Clarke, Brian; Funk, Brenda;
drukavina@munsch.com; tberghman@munsch.com; Matthew Okin; Edward Clarkson;
Cam Hillyer
Subject: RE: Interim Order on 2004 Motion

Okay, I'm beginning to feel like I'm being gaslighted. We are really working hard to move this process along.

Thanks.

Jim



James W. Bartlett, Jr.
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From: James W. Bartlett, Jr.
Sent: Thursday, May 11, 2023 12:19 PM
To: Adam Langley <Adam.Langley@butlersnow.com>; Guffy, Philip <PGuffy@hunton.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Funk, Brenda <bfunk@munsch.com>; drukavina@munsch.com; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>
Subject: RE: Interim Order on 2004 Motion

Any other comments?

Thanks.

Jim

From: James W. Bartlett, Jr.
Sent: Thursday, May 11, 2023 11:49 AM
To: Adam Langley <Adam.Langley@butlersnow.com>; Guffy, Philip <PGuffy@hunton.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Funk, Brenda <bfunk@munsch.com>; drukavina@munsch.com; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>;

Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>

Subject: RE: Interim Order on 2004 Motion

That's fine. I just included that because it was in the original rider. But I am fine with deleting that.

Thanks.

Jim

From: Adam Langley <Adam.Langley@butlersnow.com>

Sent: Thursday, May 11, 2023 11:47 AM

To: James W. Bartlett, Jr. <jbartlett@okinadams.com>; Guffy, Philip <PGuffy@hunton.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Funk, Brenda <bfunk@munsch.com>; drukavina@munsch.com; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>

Subject: RE: Interim Order on 2004 Motion

Jim,

These look good, except I propose deleting the last sentence of Exhibit A: "The Joining Party acknowledges that the violation of any term of the Protective Order or the Interim 2004 Order could subject the Joining Party to sanctions or punishment for contempt of Court." This acknowledgment isn't needed and doesn't change anything.

Adam

Adam M. Langley
Butler Snow LLP

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From: James W. Bartlett, Jr. <jbartlett@okinadams.com>

Sent: Thursday, May 11, 2023 11:37 AM

To: Guffy, Philip <PGuffy@hunton.com>; Adam Langley <Adam.Langley@butlersnow.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Funk, Brenda <bfunk@munsch.com>; drukavina@munsch.com; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>

Subject: RE: Interim Order on 2004 Motion

Just following up. Does anyone have any comments to these documents?

Thanks.

Jim



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From: James W. Bartlett, Jr.

Sent: Wednesday, May 10, 2023 10:00 AM

To: Guffy, Philip <PGuffy@hunton.com>; Adam Langley <Adam.Langley@butlersnow.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Funk, Brenda <bfunk@munsch.com>; drukavina@munsch.com; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>

Subject: RE: Interim Order on 2004 Motion

Just following up on the attached, thanks.

Jim

From: James W. Bartlett, Jr.

Sent: Monday, May 8, 2023 11:56 AM

To: Guffy, Philip <PGuffy@hunton.com>; Adam Langley <Adam.Langley@butlersnow.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; Funk, Brenda <bfunk@munsch.com>; drukavina@munsch.com; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>

Subject: RE: Interim Order on 2004 Motion

All:

For everyone's review and comment, attached are revised Exhibits A-C to the protective order, as directed by the interim 2004 order.

Thanks.

Jim

From: Guffy, Philip <PGuffy@hunton.com>

Sent: Thursday, May 4, 2023 3:08 PM

To: Adam Langley <Adam.Langley@butlersnow.com>; James W. Bartlett, Jr. <jbartlett@okinadams.com>

Cc: Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>

Subject: RE: Interim Order on 2004 Motion

Fine here.

Philip M. Guffy | Hunton Andrews Kurth LLP
713.220.3802 | pguffy@huntonak.com
600 Travis St., Ste. 4200, Houston, TX 77002

From: Adam Langley <Adam.Langley@butlersnow.com>
Sent: Thursday, May 4, 2023 3:05 PM
To: 'James W. Bartlett, Jr.' <jbartlett@okinadams.com>; Guffy, Philip <PGuffy@hunton.com>
Cc: Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>;
drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew Okin
<mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>
Subject: RE: Interim Order on 2004 Motion

Caution: This email originated from outside of the firm.

Nothing further from FedEx.

Adam M. Langley
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From: James W. Bartlett, Jr. <jbartlett@okinadams.com>
Sent: Thursday, May 4, 2023 2:54 PM
To: Guffy, Philip <PGuffy@hunton.com>; Adam Langley <Adam.Langley@butlersnow.com>
Cc: Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>;
drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew Okin
<mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>
Subject: RE: Interim Order on 2004 Motion

Okay, latest draft is attached. I fixed a handful of nits and adjusted some language in a paragraph so that it flows better. If anyone has an issue with any of my edits, please let me know.

Thanks.

Jim



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From: Guffy, Philip <PGuffy@hunton.com>
Sent: Thursday, May 4, 2023 2:17 PM
To: James W. Bartlett, Jr. <jbartlett@okinadams.com>; Adam Langley <Adam.Langley@butlersnow.com>
Cc: Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>
Subject: RE: Interim Order on 2004 Motion

Thanks, Jim. We're fine with the order subject to Brenda's change.

Philip M. Guffy | Hunton Andrews Kurth LLP
713.220.3802 | pguffy@huntonak.com
600 Travis St., Ste. 4200, Houston, TX 77002

From: James W. Bartlett, Jr. <jbartlett@okinadams.com>
Sent: Thursday, May 4, 2023 2:11 PM
To: Guffy, Philip <PGuffy@hunton.com>; Adam Langley <Adam.Langley@butlersnow.com>
Cc: Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>; drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>
Subject: RE: Interim Order on 2004 Motion

Caution: This email originated from outside of the firm.

Yes, the financials will include the subsidiaries. Sorry for the delayed response.

Jim



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From: Guffy, Philip <PGuffy@hunton.com>

Sent: Thursday, May 4, 2023 12:53 PM

To: Adam Langley <Adam.Langley@butlersnow.com>; James W. Bartlett, Jr. <jbartlett@okinadams.com>

Cc: Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian <BrianClarke@andrewskurth.com>;

drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew Okin

<mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>

Subject: RE: Interim Order on 2004 Motion

To confirm, AMRR/MBG is planning to produce financials related to the subsidiaries, correct? If we're not getting financial information about the actual operating entities, this is all a waste of time.

Philip M. Guffy | Hunton Andrews Kurth LLP

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600 Travis St., Ste. 4200, Houston, TX 77002

From: Adam Langley <Adam.Langley@butlersnow.com>

Sent: Thursday, May 4, 2023 12:32 PM

To: 'James W. Bartlett, Jr.' <jbartlett@okinadams.com>

Cc: Guffy, Philip <PGuffy@hunton.com>; Silverstein, Paul <PaulSilverstein@andrewskurth.com>; Clarke, Brian

<BrianClarke@andrewskurth.com>; drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>;

tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>;

Cam Hillyer <Cam.Hillyer@butlersnow.com>

Subject: RE: Interim Order on 2004 Motion

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Yes.

Adam M. Langley

Butler Snow LLP

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From: James W. Bartlett, Jr. <jbartlett@okinadams.com>
Sent: Thursday, May 4, 2023 12:31 PM
To: Adam Langley <Adam.Langley@butlersnow.com>
Cc: Guffy, Philip <PGuffy@hunton.com>; paulsilverstein@huntonak.com; Clarke, Brian <BrianClarke@andrewskurth.com>; drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>
Subject: Re: Interim Order on 2004 Motion

Are you okay with Brenda's phrase?

Jim



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On May 4, 2023, at 12:17 PM, Adam Langley <Adam.Langley@butlersnow.com> wrote:

I agree that subsection (a) is speaking to use, so hopefully the change is a non-issue. The scope of the requests include subsidiaries.

Adam M. Langley
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From: James W. Bartlett, Jr. <jbartlett@okinadams.com>
Sent: Thursday, May 4, 2023 11:31 AM
To: Adam Langley <Adam.Langley@butlersnow.com>; 'Guffy, Philip' <PGuffy@hunton.com>;
paulsilverstein@HuntonAK.com; Clarke, Brian <BrianClarke@andrewskurth.com>
Cc: drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew
Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer
<Cam.Hillyer@butlersnow.com>
Subject: RE: Interim Order on 2004 Motion

I think subsection (a) just speaks to use, not the scope of the requests.

<image003.png> **James W. Bartlett, Jr.**
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Sent: Thursday, May 4, 2023 11:21 AM
To: James W. Bartlett, Jr. <jbartlett@okinadams.com>; 'Guffy, Philip' <PGuffy@hunton.com>;
paulsilverstein@HuntonAK.com; Clarke, Brian <BrianClarke@andrewskurth.com>
Cc: drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew
Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer
<Cam.Hillyer@butlersnow.com>
Subject: RE: Interim Order on 2004 Motion

I understand the legal position, but I'm not sure it relates to the Rule 2004 examination. Creditors/Trustee are going to want to know the consolidated enterprise value if there are going to be real discussions on monetizing the claims against AMRR. If AMRR is not going to participate in real monetization discussions on consolidated enterprise value based on objective information obtained through a Rule 2004 examination, please tell us.

Adam M. Langley
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From: James W. Bartlett, Jr. <jbartlett@okinadams.com>
Sent: Thursday, May 4, 2023 11:11 AM
To: Adam Langley <Adam.Langley@butlersnow.com>; 'Guffy, Philip' <PGuffy@hunton.com>;
paulsilverstein@HuntonAK.com; Clarke, Brian <BrianClarke@andrewskurth.com>
Cc: drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew
Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer
<Cam.Hillyer@butlersnow.com>
Subject: RE: Interim Order on 2004 Motion

Well, I need to give that some thought. Because our position, among other things, is that neither the Estate nor GNET has any interest in the assets of MBG's subs.

<image003.png> **James W. Bartlett, Jr.**
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Sent: Thursday, May 4, 2023 11:03 AM
To: James W. Bartlett, Jr. <jbartlett@okinadams.com>; 'Guffy, Philip' <PGuffy@hunton.com>;
paulsilverstein@HuntonAK.com; Clarke, Brian <BrianClarke@andrewskurth.com>
Cc: drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew
Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer
<Cam.Hillyer@butlersnow.com>
Subject: RE: Interim Order on 2004 Motion

Intent to is be clear we are looking at the value of AMRR as a consolidated enterprise, not just as a standalone holding company or other shell.

Adam M. Langley

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From: James W. Bartlett, Jr. <jbartlett@okinadams.com>

Sent: Thursday, May 4, 2023 10:58 AM

To: Adam Langley <Adam.Langley@butlersnow.com>; 'Guffy, Philip' <PGuffy@hunton.com>;

paulsilverstein@HuntonAK.com; Clarke, Brian <BrianClarke@andrewskurth.com>

Cc: drukavina@munsch.com; Funk, Brenda <bfunk@munsch.com>; tberghman@munsch.com; Matthew Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>; Cam Hillyer <Cam.Hillyer@butlersnow.com>

Subject: RE: Interim Order on 2004 Motion

Adam, I think the idea is the FedEx will be an MBG-authorized recipient under this Order, but will confirm today.

If I may ask, what is the reason for your edits to the last part of subsection (a)?

Thanks.

Jim

<image003.png> **James W. Bartlett, Jr.**
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Subject: RE: Interim Order on 2004 Motion

One small change on page 3, subsection (a) shown in the above redline. Otherwise, FedEx approves.

Please confirm that FedEx will be a MBG-authorized recipient based on the agreement that FedEx is not seeking requests beyond the scope of the Trustee's Rule 2004 motion at this time with FedEx reserving its right to seek its own Rule 2004 examination at a later time and MBG reserving its right to object to any future 2004 examination by FedEx.

Adam M. Langley

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Okin <mokin@okinadams.com>; Edward Clarkson <eclarkson@okinadams.com>
Subject: RE: Interim Order on 2004 Motion

For context, attached is the existing protective order with highlighting corresponding the provisions modified by the interim 2004 order.

Thanks.

Jim

<image003.png> **James W. Bartlett, Jr.**
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From: James W. Bartlett, Jr.

Sent: Thursday, May 4, 2023 9:55 AM

To: Adam Langley <Adam.Langley@butlersnow.com>; 'Guffy, Philip' <PGuffy@hunton.com>;
paul.silverstein@andrewskurth.com; Clarke, Brian <BrianClarke@andrewskurth.com>

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Berghman <tberghman@munsch.com>; Matthew S. Okin <mokin@okinadams.com>; Edward A.
Clarkson III <eclarkson@okinadams.com>

Subject: Interim Order on 2004 Motion

All, attached please find the proposed interim order on the Trustee's 2004 motion. This draft has been approved by MBG and the Trustee.

Any comments before we file?

Thanks.

Jim

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